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August 22, 2019

VIA ECF

Hon. Peggy Kuo
United States Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Miller, et al. v. Arab Bank, PLC*, 18-cv-2192 (BMC)(PK)
Pam, et al. v. Arab Bank, PLC, 18-cv-4670 (BMC)(PK)

Requested Extension of Deadline for Interrogatory Responses

Dear Judge Kuo:

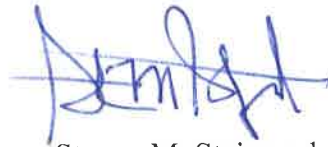
We write on behalf of all Plaintiffs in the above-referenced matters to request an extension of the August 23, 2019 deadline set forth in Your Honor's Scheduling Order of July 8, 2019 for service of responses to interrogatories. This is the first request for an extension of this deadline. The reason for the requested extension is that there are 14 interrogatories directed to more than 60 plaintiffs in these matters, a significant number of whom reside in Israel, and there is insufficient time under the current framework to properly prepare and serve substantive individual responses on their behalves. Plaintiffs therefore request that interrogatory responses be served on a rolling basis commencing on September 23, 2019 and continuing through November 22, 2019 (which allows us to take into consideration the upcoming Jewish holidays).

In addition, Defendant proposed and Plaintiffs agreed that Plaintiffs would serve their objections to the interrogatories no later than September 3, 2019 so the meet and confer process can move forward on both the interrogatories and the document request responses (which will be served as scheduled on August 23, 2019) in parallel with Plaintiffs' counsel conferring on an ongoing basis with the individual Plaintiffs to prepare interrogatory responses.

Counsel for the Defendant have advised us that they do not oppose the foregoing proposals.

We thank the Court for its consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'S. Steingard', with a stylized flourish at the end.

Steven M. Steingard

cc: All Counsel